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August 25, 2014

Hon. Roslynn R. Mauskopf  
Hon. Joan M. Azrack  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201  
By ECF

*Luv N' Care, Ltd. et al. v. Manuel, Shibolet LLP, et al.* -- 1:13-cv-04720 (RRM)(JMA)

Dear Judge Mauskopf and Judge Azrack:

Unfortunately, the Court has received an extraneous letter (dated August 22, 2014) from Mr. Charles Manuel, who is one of the Defendants alleged to have committed malpractice as part of Shibolet LLP. To respectfully correct counsel, inasmuch as Mr. Manuel's original letter to the Court had violated the Court's Order (as comprising 4 pages) -- and had included 15 pages of unauthorized and essentially irrelevant material -- Luv n' care was forced to respond.

Moreover, Defendant Manuel's letter contains no information which challenges the substance of the undersigned's letter of August 15, 2014, or which is otherwise pertinent to the issues before the Court, such as:

- the attorney-client relationship between Shibolet LLP and Luv n' care;
- the tolling of the relevant statute of limitations;
- the underlying malpractice of the Shibolet LLP Defendants; and/or
- the proper venue of the case in this Court.

Therefore, Mr. Manuel's most recent motion-letter should be stricken under the provisions of Rule 12(f) Fed. R. Civ. P., as constituting "redundant, immaterial, impertinent, or scandalous matter."

Based on the un rebutted evidence before the Court, the Defendants should be ordered to answer Luv n' care's Complaint, and the same is respectfully requested.

Respectfully submitted,

A handwritten signature in blue ink that reads "RM Ward".

Robert M. Ward